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December 12, 2022

VIA ECF

The Honorable Jennifer L. Ronchon
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

Re: *Yan Luis v. Framebridge, Inc.*, Case No. 22 Civ. 9016 (JLR)

Dear Judge Ronchon:

This firm is counsel to Defendant Framebridge, Inc. (“**Framebridge**”) in the above-referenced action. We write, as directed in the Court’s Order dated October 25, 2022 (Dkt. No. 5) requiring a joint letter by December 12, 2022 regarding whether the Parties preferred that (i) the case proceed to mediation or to a settlement conference before a magistrate judge, or (ii) the case proceed to an initial status conference. We have not received any response from counsel for Plaintiff, and therefore we are unable to write jointly.

Counsel for the parties has met once to discuss this submission and to discuss possible early resolution. We advised Plaintiff’s counsel on December 9 that Framebridge prefers to proceed with a settlement conference before the Magistrate Judge, but Plaintiff’s counsel did not express a preference. As of the date of this letter, Plaintiff has not provided Plaintiff’s position on proceeding with a settlement conference before a magistrate judge. The parties did discuss settlement during the conference, and although Plaintiff’s counsel has not responded further to communications from Framebridge’s counsel, Framebridge continues to believe that there may be ground to resolve this action without judicial intervention.

Given the foregoing, Framebridge respectfully requests:

1. A second, 30-day extension of its deadline to respond to Plaintiff Kevin Yan Luis’ Complaint up to and including January 16, 2023, pursuant to Paragraph 1(F) of Your Honor’s Individual Rules and Practices in Civil Cases. The original deadline for Framebridge to file a responsive pleading was November 16, 2022, which Your Honor previously extended to December 16, 2022. This is Framebridge’s second request for an extension of its deadline to respond.
2. That the Court order this case be referred to the Magistrate Judge for a settlement conference, but that the conference not occur until sometime after January 16, 2023, to

allow the Parties additional time to attempt to resolve this matter without the need for Court resources.

We are grateful for the Court's attention to this matter.

Respectfully submitted,

Davis Wright Tremaine LLP

/s/ Mohammad B. Pathan

Mohammad B. Pathan

cc: All Counsel of Record

Defendant's request for an extension of time to answer the complaint is granted. Defendant shall answer or otherwise respond to the complaint by **January 16, 2023**.

Plaintiff shall forthwith confer with Defendant and respond to the Court's order (ECF No. 5) by **December 20, 2023**. Compliance with the Court's orders is expected.

Dated: December 13, 2022
New York, New York

SO ORDERED



JENNIFER L. ROCHON
United States District Judge